UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

APR 22 2016

OFFICE OF
ENFORCEMENT AND
COMPLIANCE ASSURANCE

VIA CERTIFIED MAIL RETURN RECEIPT REQUESTED AND ELECTRONIC MAIL

IN THE MATTER OF: Pittsburg Power, Inc.

ATTENTION:

Mr. Michael J. Bruzzese
The Bank Tower, Suite 1008
307 Fourth Ave.
Pittsburgh, PA 15222
mjb@mjb-law.net

Dear Mr. Michael J. Bruzzese,

Thank you for Pittsburg Power, Inc.'s submission of documents in response to the Environmental Protection Agency's request for information. The EPA has thoroughly reviewed the information submitted by Pittsburg Power, Inc. on December 21, 2015. Although the submission did contain some responsive information, the EPA requires further information from the company in order to better understand their current compliance status. Below, you will find a short list of questions compiled after reviewing the December 21, 2015 submitted information that the EPA requires for continued analysis.

1. Provide a list of all Pittsburg Power Box vehicle applications that are currently manufactured and/or offered for sale by Pittsburg Power. For example, "Cummins 2003-2007 EGR ISX" and "Cummins 2008-2011 ISX EGR/DPF" would be two separate applications. For each application:
    a. List all compatible EPA engine families (e.g., 8CEXH0912XAK, 6CPXH0928EBK), if known.
    b. Indicate whether PEMS testing has been completed or whether/when PEMS testing will be completed in the future.
    c. If PEMS testing has been completed, provide the completion date and EPA engine family.

2. The test data, provided in Pittsburg Power's December 21, 2015 response, is not complete test data typically associated with PEMs testing. Provide the information itemized below for each PEMs test. For clarity, the checked items on the list indicate items EPA was able to identify in the December 21, 2015 response.

   ✓ checks = data provided with preliminary summary results 12/21/2015
   ☐ boxes = data not provided with preliminary summary results 12/21/2015

Summary PEMS Test Results

Information related to who performed the test and where
- ☐ Description of on-road driving route (city, state, road numbers, map, etc.)
- ✓ Name of company performing test
- ☐ Test facility name, location
- ✓ Technical POC name
- ☐ Technical POC contact information

Information related to the PEMs unit:
- ✓ Manufacturer
- ☐ Model
- ☐ Lab calibration and certification info

Test vehicle info
- ✓ Make, model, model year
- ☐ EPA engine family
- ☐ VIN
- ☐ Test vehicle odometer reading at start of test
- ✓ Test vehicle configuration (stock or modified, with a full description of modifications applied)

Test Data
- ☐ Test start time, Test end time, Test duration
- ✓ Total mass of emissions, by pollutant (g)
- ✓ Total distance-based mass emissions (g/mi, g/km)
- ✓ Overall work-based mass emission rates (g/bhp-hr)
- ✓ Distance traveled (mi or km)
- ✓ Total fuel consumed (gal or grams)
- ✓ Total output work performed (bhp-hr)
- ✓ Overall fuel economy (mpg)
- ☐ Overall average ambient temperature, barometric pressure, humidity
- ☐ DPF regeneration summary if applicable (was DPF regeneration status monitored, how was it monitored, did a regeneration occur)

PEMS Test Data (test method information)
- ☐ Pre- and post-test audit and calibration results, including actual (not nominal) gas concentrations and audit / calibration results
- ☐ Fuel data (carbon / hydrogen content, ethanol content, specific gravity, etc.)
- ☐ Pre-test soak time, engine start temperature
- ☐ Method used for calculating mass-based emissions (fuel flow rate method or exhaust measurement)
- ☐ Exhaust flow measurement system and principle, if used (including equipment mfr and model)

- ☐ Torque determination method (ECM data or calculated, also with or without frictional torque)
- ☐ Overall average dry and wet pollutant concentrations
- ☐ Curb idle load (%)
- ☐ Average NO_x humidity correction (Kh) factor
- ☐ Methods used for various correction factors (wet/dry, NOx humidity correction factor, dilution (if applicable), drift, etc.)
- ☐ Instrument detection limits for various pollutants
- ☐ Exhaust flow measurement technique and data (including exhaust temperatures)
- ☐ RPM measurement method (ECM, external sensor, other)
- ☐ Particulate measurement methods, if performed

PEMS Test Data (second-by-second test data)

- ☐ Absolute timestamps for each record
- ☐ Raw pollutant concentration measurements (wet and dry)
- ☐ Dry to wet correction factors
- ☐ Other correction factors / adjustments applied to the data (i.e., NOx humidity correction factor, drift corrections, etc.)
- ☐ NTE zone testing cycle indicators (if vehicle is subject to the NTE limits)
- ☐ DPF Regeneration status (if vehicle is equipped with DPF)
- ☐ Measurement system operational parameters (PEMS internal temperatures, pressures, flows)
- ☐ Vehicle / engine recorded parameters (ECM live data), including engine RPM, vehicle speed, engine temperature, engine load, engine torque / horsepower (absolute brake), fuel trim / fuel rate, mass air flow, manifold absolute pressure, O_2 data, ignition timing advance, etc.)
- ☐ RPM and speed if not from ECM
- ☐ Environmental conditions (ambient temperature, barometric pressure, relative humidity)
- ☐ Real-time GPS (would include location and speed and grade)
- ☐ Particulate measurement flows, dilution, results
- ☐ Instantaneous time-based mass emission rates calculated using measured parameters (g/second)
- ☐ Instantaneous work-based mass emission rates calculated using measured parameters (g/BHP-hr)

Please submit all requested information, via courier service or overnight delivery, to:

Brianna Iddings
U.S. Environmental Protection Agency
Air Enforcement Division
William Jefferson Clinton Building South, Room 1142B
1200 Pennsylvania Ave., NW
Washington, D.C. 20004

I am the attorney assigned to this case, and will be your point of contact moving forward. If you have any questions or need any clarification while answering these inquiries, please feel free to contact me at any time. I can be reached via phone at 202-564-7581, or email at iddings.brianna@epa.gov.

April 22, 2016
Date

Brianna L. Iddings
Attorney Advisor
Air Enforcement Division
Office of Civil Enforcement